

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN BOYD, VERYL SWITZER, GILLAN
ALEXANDER, ROD BRADSHAW, WILBURT
HOWARD, PAT DAILEY, MELVIN ERB, and
DENNIS BROTHERS on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

AWB LIMITED and AWB (U.S.A.) LIMITED,

Defendants.

ECF CASE

No. 1:07 CV 3007 (GEL)

**REPLY DECLARATION OF DANIEL P. ROESER IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
THE CONSOLIDATED CLASS ACTION COMPLAINT**

DANIEL P. ROESER hereby declares as follows:

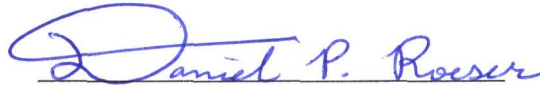
1. I am a member of the bar of the State of New York. I am associated with the firm of Cravath, Swaine & Moore LLP, attorneys for Defendants AWB Limited and AWB (U.S.A.) Limited in this action. I submit this reply declaration in support of Defendants' Motion to Dismiss the Consolidated Class Action Complaint.

2. Attached hereto as Exhibit A is a true and correct copy of page 109 from Volume 4, Chapter 31, and pages 345-48 from Volume 5, Appendix 26, of the report entitled Report of the Inquiry into certain Australian companies in relation to the UN Oil-for-Food Programme, by The Honourable Terence RH Cole AO RFD QC, commissioner of said Inquiry, dated November 2006.

3. Attached hereto as Exhibit B is a true and correct copy of Exhibit 1495 (“Market Brief 1st Quarter 2003 Iraq”) to the report entitled Report of the Inquiry into certain Australian companies in relation to the UN Oil-for-Food Programme, by The Honourable Terence RH Cole AO RFD QC, commissioner of said Inquiry, dated November 2006.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 3, 2007.


Daniel P. Roeser